

UNITED STATES DISTRICT COURT
for the
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

WENGUI GUO
a/k/a Miles Kwok,

Plaintiff,

- against -

YELIANG XIA,

Defendant.

CASE NO. 1:18-CV-00174-LO-TCB

**PLAINTIFF WENGUI GUO'S RESPONSES
AND OBJECTIONS TO DEFENDANT'S NOTICE TO ADMIT**

Plaintiff Wengui Guo ("Wengui"), by its attorneys, Zeichner Ellman & Krause LLP, pursuant to Federal Rule of Civil Procedure 36, hereby submits its responses and objections to plaintiff Yeliang Xia's ("Defendant") Notice to Admit.

1. You have many alias names that appear in your various legal documents or property title documents, i.e., Ho Wan Kwok, Miles Kwok, Haoyun Guo and such alias or alter egos as "Golden Spring (New York) Ltd., Shiny Times Holding Ltd., Spirit Charter Investment Ltd. Hong Kong Dongli Company Limited; Arab China Investment Co. Ltd. Etc, etc. .

Response: Wengui objects to this request as it is unclear what Defendant seeks an admission or denial of. Subject to Wengui's objection, denied.

2. In the Complaint, you claimed that you have about 491000 followers and boasts the largest number of supporters among Chinese Twitter users because you are a "pioneer of using YouTube and Twitter to fight for the rule by law in Communist China". You claimed in your

complaint that you are the only one who single-handedly challenged the CCP in the CCP's 70-year rule" (Complaint, p2) and you also alleged that your video speech watched everyday by billions of audience through YouTube, Guo Media, etc. You stated that you have interviewed by the top and most influential media in the world (including NYT, WSJ, Washington Post, AP, Reuters, Time, etc.) therefore you deem yourself as a very influential public figure in both China and the whole world; while claiming to be a "pioneer using YouTube and Twitter to fight for rule of law among others, having unprecedented impact on the international image of the CCP, and your disclosure has shown the ways the Chinese people are tortured...", therefore you deem yourself as an outstanding figure in a unique stage who are known to many people in and out of China and your speeches and activities, according to your self-characterization, is of public concern;

Response: Wengui objects to this request as it is unclear, vague, unintelligible and contains several different factual allegations and it incorporates undefined terms that are unclear. Therefore, it is impossible to admit or deny. Subject to Wengui's objection, denied, however, Wengui admits that he has many social media connections.

3. You are now acting in the United States, to engage in such covert operation, using what you pledged in your 08/26/2017 correspondence, your "influence and resource" to advocate and propagandize "Chairman Xi Jinping's" international agenda and global initiative under the code name of "Chinese dream" as an agent or propagandist for the People's Republic (PRC), allegedly under your handler(s) in Beijing, which you repeatedly and publicly referred to as your "Leader(s) and Organization" or "laolingdao" while you haven't registered with the U.S. Department of Justice in pursuant to "Foreign Agents Registration Act".

Response: Wengui objects to this request as it is unclear, vague, unintelligible and contains several different factual allegations. Subject to Wengui's objection, denied.

4. You have brought at least 17 law suits mostly targeting leading Chinese dissidents starting year 2018, and threatening to sue several other peers in line, with \$100 million in legal funds you personally established and pledged, and to render them to be preoccupied and bankrupted in two to three years, as you have vowed and announced to public in your most recent talk shows, is such an operation under your initiative as an integral part of your "dedication to Xi Jinping's Chinese dream on international stage" by using all "your resources and influence" to implement your dedication pledge set forth in your 08/26/2017 letter of allegiance.

Response: Wengui objects to this request as it is unclear, vague, unintelligible and contains several different factual allegations. Subject to Wengui's objection, denied.

5. You have been accused for allegedly "kidnapping", "unlawful detention" and "raping" Miss Rui Ma, your former female employee and it was reported by numerous mainstream mediums with a featured story and you didn't do anything for trying to stop the media's widespread dissemination or demanding in writing for corrections and apology

Response: Wengui objects to this request as it is unclear, vague, unintelligible and contains several different factual allegations. Subject to Wengui's objection, Wengui admits that he has been accused of the referenced actions by Rui Ma, but denies that he engaged in such activity.

6. On September 1, 2015, according to the complaint filed by Miss Rui Ma, unmarried and in her twenties, you “pulled down your pants and underwear, and began to tear down Miss Rui Ma’s skirts and tights, physically battering her in the process.”

Response: Wengui objects to this request as it is outside the scope of discoverable material and merely seeks an admission or denial as to the contents of a document, drafted by a non-party, that speaks for itself. Subject to Wengui’s objection, denied.

7. On April 6, 2016, after you coerced Miss Rui Ma to drink alcohol with you and get her intoxicated and slept, Miss Rui Ma was “only to be awoken” finding you were “lying on top of her and attempting to forcefully separate her legs. “ Miss Rui Ma “yelled at you to stop”. Eventually, you “overpowered her, and engaged in non-consensual forced sexual intercourse with” Miss Rui Ma. After your violence, you left Miss Rui Ma alone, bleeding in her bed.

Response: Denied.

8. Graphical and vivid description of sexual assault and rapes are quoted from Miss Rui Ma’s Complaint against you in civil tort case 158140/2017, and broadly reported by press, yet you are the one who does not admit or give it any credit.

Response: Wengui objects to this request as it is unclear, vague, and unintelligible. Wengui further objects to this request as it contains multiple factual allegations. Subject to Wengui’s objection, Wengui denies the allegations in the referenced complaint.

9. Admit you have publicly announced on November 21, 2017 and advertised that you would pay reward of \$100,000.00 to procure testimony charging such alleged felony as “rape”, “sexual assault” against 8 targeted subjects including Defendant and Teng Biao(a Chinese

lawyer of human rights) and Meng Weican (a/k/a Wei Shi, a media publisher) and several more dissidents against CCP, ending up with one alleged victim coming up to you for your promised cash rewards. -See, <https://youtu.be/9fzY7z0bgdw>

(20:00 – 23:20) posted on Nov 21, 2017.

You made such public pronouncement by offering \$100,000.00 for each tip off provided by each woman “victim”;

You did not request that such an offer of victim’s testimony in exchange for \$100,000.00 in cash must be based upon truth;

You did not intend to honor your offered payment of such \$100,000.00 cash at the 1st place, and ended up with your dishonoring \$100,000.00 offer when one female restaurant owner from California volunteered to help you.

You knew that your fishing trip with decoy of \$100,000.00 in trading for perjury will place such eight predetermined targets with label of “sexual predators”, including Defendant, in false light of public humiliation and legal troubles.

Response: Denied

10. . On May 1, 2018, you claimed on Youtube that there are altogether 171 transactions you paid to your active supporters.--See, https://youtu.be/_fG6BjfnT6E?t=2238

(37:18--37:44)

In the past two years you gave or promised to give \$1 Million to Zhao Ming and his Australia team, \$170,000 to a Japanese car Xiang Lin and his Japanese team for Car

Parade, \$20,000 and other benefits to Guo Baosheng. Your accomplices and flunkies launched cyber personal attack on the targeted dissidents and organized collective slander, libel against those victims including Defendant, you not only provide funding for your gangs, but also provide uniforms and combating caps with your own design of logos which are identical to the logo of your own media, Guo Media. You did not report to U.S. Department of Justice, neither did you report to U.S. Department of Treasury while you are causing such cash flowing from your accounts overseas into the United States, before or after Hong Kong Criminal Court convicted you and your proxies for Money Laundering and confiscated HK Dollars 32.8Billion equalizing U.S. \$4.2billion, neither did you caution to all your lawyers that they must report to U.S. Department of Treasury for taking your large amount of fees in cash wired through international money transfer channels:

Response: Denied.

11. Admit that you have sex with many of your employees including Wang Yanping, Yu Yong, Qu Guojiao, Miss Ding and many more. In August 2010, you tried to rape your employee Chen, who was a secretary at Food Department of Pangu. See, http://news.ifeng.com/a/20170419/50968081_0.shtml

Numerous mediums worldwide, such as Associated Press (AP) published the tort case Miss Rui Ma brought against you for your rape, among other alleged offenses, you did not write to these presses requesting for corrections because you knew that accusation was based on the facts.

Response: Denied.

12. In the letter of allegiance on August 26, 2017, you declared publicly that you are a staunch supporter of Chinese communist dictator Xi Jinping, and you pledged to your leader and your organization that you would dedicate your life to safeguard Xi and use your resources and influence to help propagandize Xi's "Chinese dream" on international stage. You did that in the aim of returning to China and avoid possible punishment with your potential outstanding merits and achievements to sabotage overseas Chinese movement of democracy by attacking and smearing the dissidents and activists.

Response: Denied.

13. Before August 26, 2017, you secretly received Liu Yanping at your New York residence, who was then a minister level official from China's Ministry of State Security (MSS, which is similar to KGB of former Soviet Union) who sneaked into the United States as a visitor by concealing his real identity with communist China's secret police apparatus, you and Liu had a lengthy discussion in covert operation; After your secret meeting, Liu was briefly detained at his exit at JFK Airport and later released. You hinted in your video speech that you reported to FBI and CIA since Liu didn't agree on your requests.

Response: Wengui objects to this request as it is unclear, vague, unintelligible and contains several different factual allegations, some of which could not be within Wengui's knowledge. Subject to Wengui's objection, Wengui admits that Liu Yanping visited the United States prior to August 26, 2017, but otherwise, denied.

14. In your Complaint, you define yourself as a "political dissident". Yet in a broadly publicized letter of allegiance dated August 26, 2017 to Chinese authority and its tyrant Xi Jinping to whose domestic and global agenda, namely, "Chinese dream", you explicitly expressed

you would mobilize your resource and influence on the international stage to make your contribution, the recipient of your loyalty and service, what you referred to as “the leader(s) and organization, included Liu Yanping; Ma Jian; Zhang Yue, while so-called “organization” is Chinese secret police apparatus, namely, “The Ministry of State Security(MSS)”, among others. You have alleged that you have been working for MSS and got the first-class merits from MSS for three times, it means you made an extraordinary contribution to MSS and CCP. In the result, people may correctly call you as a special agent, an espionage or a spy served CCP and MSS in China.

Response: Wengui objects to this request as it is unclear, vague, unintelligible and contains several different factual allegations. Subject to Wengui’s objection, denied, except admitted as to Wengui’s self-description as a “political dissident.”

15. Shortly after your loyalty pledge with the letter of allegiance on August 26, 2017 to Chinese authority and its tyrant Xi Jinping to whose domestic and global agenda, namely, “Chinese dream”, you have actually honored your loyalty pledge by mobilizing your “resource and influence” on the international stage to start a long line of frivolous legal actions placing approximately 20 Chinese dissidents on exile in 16 defamation suits in U.S. Courts from coast to coast. The skyrocketed fees and cost of all these litigations are paid by your “leader(s)” and your “organization”, because you recently alleged that you are a poor man with “minus assets”, no job and no income in the past 4 years since your stay in the United States and literally living on loaned money for your luxury life, “a team of private guards consisting of retired Seal soldiers and policemen” according to your own introduction.

From time to time you alleged that you enjoy special protection including snipers on the roof of neighboring high-rise buildings and crews of Secret Service working for US president

and you even showed a badge of Secret Service pinned in your chest of suit during your video speech, thus you proved in public that you are a VIP with the privilege under protection of Secret Service with approval of US president.

Response: Wengui objects to this request as it is unclear, vague, unintelligible and contains several different factual allegations. Subject to Wengui's objection, denied.

16. The official language being used in U.S. Courts is English. You are completely illiterate in English Language and barely literate in Chinese written language; therefore, all your efforts to serve the dictator Xi Jinping and his flunkies as Ma Jian, Liu Yanping, by propagandizing "Chinese dream" on "international stage", virtually an English-speaking world, must be relying on translator/interpreter's assistance. Because you are a poor man with no job or income in the United States, therefore, your Beijing based "leaders" and "organization" provided you with such effective communication helpers like Ms. Wang Yanping (who claimed herself as a long-term active member of CCP and it's unclear if she has ever confessed that identity to USICE) to you free of charge, serving you day and night.

Response: Wengui objects to this request as it is unclear, vague, unintelligible and contains several different factual allegations. Subject to Wengui's objection, denied, except admitted as to the use of the English language in the U.S. Court system.

17. Before your departure from China in later 2014, you were corroborated with your superior within what you pronounced "the organization", Mr. Ma Jian, your close partner and one of your "leaders", 1st Deputy Minister of the Ministry of State Security, in having engaged in series of expropriation of several multi-billion dollar private enterprises empty-handedly, at the cost of the long list of victims who barely survived jail term witnessing all his hard earned properties

were taken by you and Mr. Ma Jian for free. Not all victims falling into the hands of Chinese Secret police were as lucky as Mr. Qu Long, whose disclosure was corroborated by former Deputy Minister Ma Jian's publicized Confession through CCTV.

Response: Wengui objects to this request as it is unclear, vague, unintelligible and contains several different factual allegations. Wengui further objects to this request as it is unclear what Defendant seeks an admission or denial of. Wengui further objects to this request as it purports to seek the admission or denial of the drafter's opinion.

18. With your 08/26/2017 Loyalty service pledge in place to mobilize your resource and influence on international stage to advocate and propagandize your maximum leader's "Chinese dream" agenda, you repeatedly and boldly advertised, announced, and publicized advertisements, calling for all female victims to stand up, to speak out their grievance of being sexually assaulted, raped, or molested by Defendant Xia Yeliang, Xiong Xianmin, Li Weidong, Liu Gang, and Teng Biao whom you allegedly call him as "the incest Biao" (you named Teng as "Luanlun Biao"), by offering \$100,000.00 to procure each woman's story of being sexually assaulted as ultra-generous reward. Because you testified under oath that you are a poor man with no legitimate or ethical job or income in the United States, your cash rewards are funded by your Beijing based "leaders" and "the organization";.

Response: Denied.

19. With your 08/26/2017 Loyalty service pledge in place to mobilize your resource and influence on international stage to advocate and propagandize "Chinese dream" agenda, at least one woman answered your advertisement and public announcement of \$100,000.00 reward by fantasizing, fabricating a false story of being "sexually molested" by "Professor Xia

Yeliang”, completely a stranger to her, in her California Restaurant. That woman demanded for what you had offered \$100,000.00 for her cooperative service of “testimony” in your need; The woman ended up getting paid for only \$10,000.00. The fact indicated that did not plan to honor your promise of \$100,000.00 at the first place when you made public announcement for procuring perjury by bribery;

Now you still believe the story told by alleged victim of sexual molestation is true, and you deny any fabrication or perjury/ subornation perjury, you promise to provide solid evidence, verified proof, medical test and diagnosed results, and witness in this court and you are willing to be punished with compensation of three million USD for the general defamation and malicious harm on Defendant.

Response: Denied.

20. You entered into a controversial \$9-million contract with Las Vegas based Spying, Detective and Investigative Firm, namely, Strategic Vision USA LLP (SV) , in December 2018, inducing and coercing the firm, according to their pleading paper, to engage in unlawful spying on many of ultra- sensitive people, whom you do not even know, who are under the protection of the U.S. Government among these targeted persons in you submitted hitting list.

One million USD was wired to the SV from Hong Kong under your instruction before the contract was even executed. At the time, all assets of yours, or in your alias or your alter egos were seized and forfeited because you were convicted for a felony of money laundering judged by the local court. Hence the money paid to SV was from “leader” and “organization” to hit all the targeted people including this Defendant because you are a poor man with no legitimate job and income and living on loans and squander on loans. You are a unique guy in the world since you can

always squander on loans and you never worry about how to return and compensate the loan lenders.

Response: Denied.

21. You sent several classified documents with “absolutely confidential” mark to Mr. Bill Gerts in order to honor your pledge of “resource” and “influence” on U.S. government’s decision making. You alleged that you have burnt three documents with top confidential classified marks in fury in the public bathroom during a press conference held in Washington DC. You insist that you have never purchased or provided funding for fabricating fake documents that assumed leaking from the top leaders in China. You can always get the top confidential document from the top leaders as you demanded.

Response: Wengui objects to this request as it is unclear, vague, unintelligible and contains several different factual allegations. Subject to Wengui’s objection, denied.

22. It is you who disseminated rumors via your widespread video speech through internet that Defendant has such sexually transmitted disease as HPV, herpes, Aids, etc. and has caused many women into metrocarcinoma, cervical cancer, HPV, Aids, etc. You have solid evidence, proof, medical test results and witness supporting your public statement and you are willing to be punished with compensation of five million USD for the defamation per se if you can’t provide solid evidence, verified proof, medical test and diagnosed results, and witness in this court.

Response: Wengui objects to this request as it is unclear, vague, unintelligible and contains several different factual allegations. Subject to Wengui’s objection, denied.

23. It is you who disseminated rumors globally that Defendant is a “beast” rather than a “professor” according to what you alleged one female student of “Peking University” angrily condemned Defendant to sexually assaulted her, and you alleged that the female student has contacted you and provided with evidence for the accusation. You promise that the alleged female student would appear as a witness or provide solid evidence, proof and witness in this court and you are willing to be punished with compensation of two million USD for the general defamation if you can’t provide solid evidence, verified proof, medical test and diagnosed results, and witness in this court.

Response: Wengui objects to this request as it is unclear, vague, unintelligible and contains several different factual allegations. Subject to Wengui’s objection, denied.

24. It is you who publicly pronounced and threatened that you would institute unspecified severe consequences against Defendant’s son and children of such other dissidents as Xianmin Xiong, Meng Weican and “Incest Teng Biao”, etc.

Response: Wengui objects to this request to the extent that it is unclear and unintelligible. Subject to Wengui’s objection, denied.

Un-numbered paragraph. You planned and declared to revenge and maliciously harm the children of your targets and defendants who are chained into the lawsuits you initiated, your scheme and action has gone far beyond the ethical norm in a civilized society. You don’t care public feelings and would go on with your revenge no matter what consequences might follow your irrational misconducts.

Response: Denied.

25. In the long list of 92 names presumably including this Defendant, that you provided to Strategic Vision US LLP, to induce the latter to engage in what latter alleged “criminal activities” in consideration of \$9 million service fee including \$1million being paid by you 4days before signing of the contract, from ACA Capital Group’s Hong Kong account on 01/02/2018, more than 60 people, i.e., the super majority of Defendant’s peers, you did not have any personal acquaintance, knowledge, or relevance.

Also under “China Dream”, you covert action in the United states include, yet not limited to, to get information of 92 victims under your projected tracking through SV’s assistance to locate their accurate whereabouts by “geolocations”, traveling plans at real time, decoding and illegal access “remotely” into their real time electronic communication in violation of USDOS’s “Protected Records” and other U.S. anti-espionage Law, anti-terrorist law, is to help your handler’s grand conspiracy by distortion and/or to help Arabic terrorist attacks on these targeted subjects for planning and implementation in accuracy.

Response: Wengui objects to this request as it is unclear, vague, unintelligible and contains several different factual allegations. Subject to Wengui’s objection, denied.

Dated: Washington, D.C.
April 19, 2019

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